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8 UNITED STATES DISTRICT COURT
9 NORTHERN DISTRICT OF CALIFORNIA
10 SAN FRANCISCO DIVISION

11 NEXTDOOR.COM, INC.,

12 Plaintiff,

13 vs.

14 RAJ ABHYANKER,

15 Defendant.

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17 RAJ ABHYANKER,

18 Counterclaimant,

19 vs.

20 NEXTDOOR.COM, INC., et al.

21 Counterdefendants.
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Case No. 3:12-cv-05667-EMC

**DECLARATION OF RAJ ABHYANKER
REGARDING CERTAIN DOCUMENTS IN
RESPONSE TO JUDGE COUSINS' JULY
1, 2014 ORDER (ECF NO. 250)**

Courtroom: A – 15th Floor

Discovery Judge: Hon. Nathanael Cousins

1 I, RAJ ABHYANKER, declare as follows:

2 1. I am the Defendant in this lawsuit. On July 1, 2014, Judge Cousins issued an
3 order requiring me to submit a declaration explaining my knowledge as to three categories of
4 documents and my efforts to locate these documents. ECF No. 250, at 3:24 – 4:4. The three
5 categories of documents are set out in ECF No. 232-1: (1) Item 3.b (“A copy of the ‘CD or flash
6 drive’ that Mr. Abhyanker claims he received from his assistant containing the Benchmark
7 Diligence CD”); (2) Item 3.d (“The original physical copies of the 2006 LegalForce entity
8 corporate records”); and (3) Item 3.e (“The original physical copy of the Sandeep Sood
9 confidentiality agreements.” ECF No. 232-1, at 2. In accordance with Judge Cousins’ Order,
10 each of these categories of documents is addressed below.

11 **Item 3.b – A Copy of the CD or Flash Drive Containing the Benchmark Diligence CD**

12 1. My knowledge is that any and all media that I had within my possession, custody,
13 or control responsive to this issue have been timely provided by me to my counsel. My counsel
14 and I have searched all computers and physical spaces that might contain responsive media. On
15 July 14, 2014, my counsel told me that responsive media to this issue has already been produced
16 as RA-396 on or about December 23, 2013.

17 **Item 3.d – The Original Physical Copies of the 2006 LegalForce Entity Corporate Records**


18 2. My knowledge is that any and all documents that I had within my possession,
19 custody, or control responsive to this issue have been timely provided by me to my counsel. My
20 counsel and I have searched all computers and physical spaces that might contain responsive
21 documents.

22 **Item 3.e – The Original Physical Copy of the Sandeep Sood Confidentiality Agreements**

23 3. My knowledge is that any and all documents that I had within my possession,
24 custody, or control responsive to this issue have been timely provided by me to my counsel. My
25 counsel and I have searched all computers and physical spaces that might contain responsive
26 documents.

1 I declare under penalty of perjury under the laws of the State of California that the
2 foregoing is true and correct.

3 Executed July 15, 2014 at Mountain View, California.

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5  7/15/14
6 Raj Abhyanker